

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

DENISE PINNOCK,

Defendant.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: JAN 5

INFORMATION

S1 05 Cr. 103 (RPP)

COUNT ONE

The United States Attorney charges:

1. From in or about 1997 up to and including in or about 2004, in the Southern District of New York and elsewhere, DENISE PINNOCK, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that DENISE PINNOCK, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.

(Title 21, United States Code, Section 846.)

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**COUNT TWO**

The United States Attorney further charges:

3. From in or about 1997 up to and including in or about 2004, in the Southern District of New York, DENISE PINNOCK, the defendant, unlawfully, knowingly, and intentionally did distribute and possess with intent to distribute a controlled substance, to wit, more than 30,000 kilograms of mixtures and substances containing a detectable amount of marijuana.

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A), and Title 18, United States Code, Section 2.)

**COUNT THREE**

The United States Attorney further charges:

4. From in or about 1997 up to and including in or about 2004, in the Southern District of New York, DENISE PINNOCK, the defendant, unlawfully, willfully, and knowingly possessed firearms in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, to wit, PINNOCK aided and abetted the possession of firearms in furtherance of the drug trafficking crimes charged in Counts One and Two of this Information.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

**FORFEITURE ALLEGATION**

5. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Information, DENISE PINNOCK, the defendant, shall forfeit to the United

States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of, the violations alleged in Counts One and Two of this Information.

Substitute Asset Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant --

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 21, United States Code, Sections 812, 841(a)(1),  
841(b)(1)(A), and 846; Title 18, United States Code,  
Sections 924(c)(1)(A)(i) and 2)

**MICHAEL J. GARCIA**  
United States Attorney.

1/5/06 Δ, produced by US Marshals, present w/ atty Allen.  
AVSA's Buehdahl + Carpenter present. Δ appears & is arraigned  
on superceding information. Δ enters plea of guilty to all three  
counts. Court accepts plea, PSA not ordered. Control date for  
next conference set for 4/5/06 at 4PM. Defendant continued  
remanded.

Patterson, J.